

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5**

**IN THE MATTERS OF:**

**BH92 Trucking.  
3529 Lousma Dr. SE  
Grand Rapids, Michigan 49548**

**ATTENTION:**

**Alen Poskovic  
General Manager  
BH92 Trucking**

**Request to Provide Information Pursuant to the Clean Air Act**

The U.S. Environmental Protection Agency is requiring BH92 Trucking ("BH92" or "you") to submit certain information about your operations. Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information to us within 30 calendar days after you receive this request.

We are issuing this information request under Section 208(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7542(a). Section 208(a) authorizes the Administrator of EPA to require the submission of information from any person who is subject to the emission standards for moving sources under Parts A and C of Subchapter II of the CAA, 42 U.S.C. §§ 7521-7554; 7581-7590. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

BH92 owns and operates a transportation and diesel engine repair business. We are requesting this information to determine whether BH92 is complying with Section 203 of the CAA and the regulations promulgated under Subchapter II of the CAA at 40 C.F.R. Part 86.

BH92 must send all required information to:

Attn: Compliance Tracker, AE-18J  
Air Enforcement and Compliance Assurance Branch  
U.S. Environmental Protection Agency  
Region 5  
77 W. Jackson Boulevard  
Chicago, Illinois 60604

BH92 must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to 18 U.S.C. §§ 1001 and 1341.

As explained more fully in Appendix C, you may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B, for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice. You should be aware, moreover, that pursuant to Section 208(c) of the CAA and 40 C.F.R. § 2.301(a) and (f), emissions data, standards and limitations are not entitled to confidential treatment. Appendix C provides additional information regarding the meaning and scope of the term “emissions data.”

This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

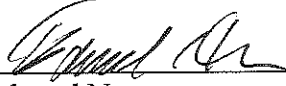
We may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject BH92 to an enforcement action under Section 205 of the CAA, 42 U.S.C. § 7524.

You should direct any questions about this information request to Cody Yarbrough at (312) 886-9137 or by email at [yarbrough.cody@epa.gov](mailto:yarbrough.cody@epa.gov).

Date

12/20/18

  
\_\_\_\_\_  
Edward Nam

Director

Air and Radiation Division

## **Appendix A**

When providing the information requested in Appendix B, use the following instructions and definitions.

### **Instructions**

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

### **Electronic Submissions**

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for "image over text" to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.
3. Provide submission on physical media such as compact disk, flash drive or similar item.

4. Provide a table of contents for each compact disk or flash drive containing electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. *We recommend the use of electronic file folders organized by question number.* In addition, each compact disk or flash drive should be labeled appropriately (e.g., Company Name, Disk 1 of 4 for Information Request Response, Date of Response).
5. Documents claimed as confidential business information (CBI) must be submitted on separate disks/drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI. Please follow the instructions in Appendix C for designating information as CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

### **Definitions**

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*, or the applicable mobile source regulations, including those found at 40 C.F.R. Parts 85, 86, 1039, and 1068.

1. The terms “document” and “documents” means any object that records, stores, or presents information, and includes: email; writings; memoranda; contracts; agreements; records; or information of any kind, formal or informal, whether handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy. All documents in hard copy shall also include attachments to or enclosures with any document.
2. The terms “BH92 Trucking” or “BH92” or “you” or “your” includes, but is not limited to: any assumed business names, agents, representatives, employees, contractors, or other entities that performed work or acted in any way on behalf of, are related to, or acted at the direction of BH92 Trucking.
3. The term “catalyst” refers to a system, such as a catalytic converter or diesel oxidation catalyst (DOC), that contains parts or chemical elements which increase the rate of a chemical reaction but are not one of the original reactants or final products, *i.e.*, are not consumed or altered in the reaction. Catalysts consist of a flow-through structure that is coated with an active metal catalyst and surrounded by a stainless steel housing.
4. The term “diesel particulate filter” or “DPF” refers to an exhaust after-treatment emission control component that physically traps particulate matter (PM) and removes it from the exhaust stream, typically using a porous ceramic or cordierite substrate or metallic filter.
5. The term “electronic control module” or “ECM” means a device that receives inputs from various sensors and outputs signals to control engine, vehicle, or equipment functions. ECM programming relies on calculations and tables of information to provide appropriate outputs. ECM can be a generic term but may refer specifically to the engine control module when discussing emission controls on vehicles and engines. ECMs may

be incorporated separately with multiple units or may be combined into a single unit.

6. The term “element of design” means any control system (*e.g.*, computer software, electronic control system, emission control system, computer logic), and/or control system calibrations, and/or the results of systems interaction, and/or hardware items on a motor vehicle or motor vehicle engine, as defined in 40 C.F.R. § 86.094-2.
7. The term “emission control component” means any part or component and its associated fluids, sensors, signals, components, and control systems that function primarily for emission control and whose deviation from original manufacturer specifications and/or failure may significantly increase emissions.
8. The terms “derate” or “limp-home mode” mean an ECM mode that reduces the engine power after the On-Board Diagnostics system identifies a problem with an emission control component.
9. The term “exhaust gas recirculation” or “EGR” refers to an emission control component that directs a portion of engine exhaust back into the engine’s combustion chamber to control combustion temperatures and pressures, thereby reducing the production of nitrogen oxides (NO<sub>x</sub>). The EGR system may include a cooler, which cools the recirculated exhaust.
10. The term “On-Board Diagnostics” or “OBD” refers to an ECM that monitors emission control and emission-related components and systems along with certain engine components, such as the fuel delivery system and the engine control module. When the OBD detects a malfunction or deterioration that could affect emissions, it illuminates a malfunction indicator light (MIL) and produces diagnostic trouble codes (DTC) to aid in repair.
11. The term “part or component” includes any part or component intended for use with, or as part of, a motor vehicle or motor vehicle engine (*e.g.*, ECM, element of design, calibration map, tune, tuner, or software that is installed on or designed for use in such vehicles or engines).
12. The term “product” or “products” shall mean any service, part or component, or other item(s), including, but not limited to, engine parts, manifolds, turbos, block plates, straight pipes, power packages, computer tuning, calibrations, elements of design, tuners, tunes, or devices, that are manufactured (*i.e.*, created, written, programmed, fabricated, produced, assembled or modified), purchased, imported, distributed, downloaded, offered for sale, sold, provided, performed, and/or installed by BH92 that are intended for use with, or as part of, a motor vehicle or motor vehicle engine.
13. The term “selective catalytic reduction” or “SCR” refers to an emission control component that includes systems, such as the diesel exhaust fluid (DEF) tank, urea quality sensor, DEF injection system, SCR catalyst(s), and other associated sensors, which inject a reductant, such as DEF, into the exhaust stream where it reacts with

catalysts to convert NO<sub>x</sub> emissions to nitrogen gas (N<sub>2</sub>) and water (H<sub>2</sub>O).

14. The term “tune” means any combination of software programming, calculations, computer logic, tables of information (*e.g.*, fuel timing maps), coding, or other content or information, stored in any form, capable of affecting or controlling an ECM.
15. The term “tuner” means any device or product capable of accessing, altering, or replacing the software programming, calculations, computer logic, tables of information (*e.g.*, fuel timing maps), code, or other content stored within or used by an ECM.

## Appendix B

### Information You Are Required to Submit to EPA

BH92 must submit the following information pursuant to Section 208(a) of the CAA, 42 U.S.C. § 7542(a), for all locations where you conduct business from:

1. Provide an **unlocked, electronic Excel-compatible spreadsheet** that lists each heavy-duty diesel vehicle (*i.e.*, those vehicles with a gross vehicle weight rating greater than 8,500 pounds) owned, operated, and/or leased by BH92 (at all facility locations) between June 1, 2016 and the date of receipt of this request. For each vehicle, provide the following:
  - (a) Any vehicle identification number used by BH92;
  - (b) Vehicle identification number (VIN);
  - (c) Engine make, model, year, size, and horsepower;
  - (d) Chassis make, model, and year; and
  - (e) The owner and operator of each vehicle.
2. Answer the following questions with a “yes” or a “no” followed by a brief explanation:
  - (a) Do you offer maintenance services to vehicles and/or engines outside of your fleet?
  - (b) Are your fleet vehicles ever serviced outside of your facilities? If yes, where and how often are they serviced outside of your facilities?
3. For each vehicle listed in response to Request 1, identify, within the same spreadsheet provided in response to Request 1, those vehicles operating (either currently or previously) with one or more modified emission control components and/or with one or more tunes and/or tuners used or installed. Modifications include, but are not limited to, the alteration of the performance or operation, blocking, bypass, defeat, disconnection, deletion, deactivation, removal (in part or in whole), or rendering inoperative in any way of any emission control component, element of design, and/or emission related part, including, but not limited to the following systems: the DPF; EGR; SCR; catalyst; OBD; and/or any fluid, sensor, signal, component, and/or control system related to these systems.
4. In the same spreadsheet provided in response to Request 1, provide the following information for each vehicle identified in response to Request 3:
  - (a) List of any and all modifications to the vehicle or engine’s emissions control



components, elements of design, and/or emission related part, including the following information for each modification:

- i. The date the modification was completed;
    - ii. Each part or component used to complete the modification, including the part or component's manufacturer, make, and model;
    - iii. All parties involved in providing the modifications; and
  - (b) List, with dates of each installation, of any and all tunes and/or tuners used or installed on the vehicle or engine, including the following information for each tune and/or tuner:
    - i. The date of each tune/tuner installation;
    - ii. The tune and/or tuner manufacturer, make, and model;
    - iii. All parties involved in providing the tuning;
    - iv. If the tune and/or tuner allows for any of the modifications described in Request 3, by, for example, enabling a modified vehicle or engine to operate without displaying a MIL, prompting a DTC, and/or causing engine derating, identify each emission control system affected by the tune and/or tuner, and specify how the tune and/or tuner affects vehicle or engine operation; and
    - v. If the tune and/or tuner alters engine operating parameters, such as fuel timing, fuel pressure, injection timing, fuel quantity, and/or injection pulse widths, specify which parameters the tune and/or tuner affects, or if not known, describe the anticipated gains from the tuner, such as increased horsepower, fuel economy, or torque.
5. Provide all documents, including invoices, purchase orders, receipts, and maintenance records dated from June 1, 2016 to the date of this request related in any way to the following:
- (a) Any modification to any emission control component, element of design, or emission related part identified in response to Request 4;
  - (b) Purchase, installation, and/or update of any and all tunes and/or tuners identified in response to Request 4 that allow for the modification of emission control components, element of design, and/or emission related part, as described in Request 4(d)(iv); and
  - (c) Purchase, installation, and/or update of any and all tunes and/or tuners identified in response to Request 4 that alter engine operating parameters, as described in Request 4(d)(v).
6. For parts, components, modifications, tunes, and/or tuners identified in response to Request 4, state whether you or any other entity conducted tests measuring emissions of hydrocarbon (HC), carbon monoxide (CO), nitrogen oxide (NO<sub>x</sub>), and/or particulate matter (PM), including tests that measure the impact of the part or component on a

vehicle's emission control components or elements of design. For each test, provide the following:

- (a) A description of the test, including: identification of the part or component and vehicle; the EPA engine family; name of the vehicle; test equipment; test protocols, and calibration procedures;
- (b) A copy of the test report which includes the date and location of the test, the name and position of the person who conducted the test, and the test results; and
- (c) A copy of any California Air Resources Board Executive Order (CARB EO) for the part or component.

7. In a separate **electronic, unlocked Excel-compatible spreadsheet**, identify each product (which includes services, as defined in Appendix A: Definitions, Paragraph No. 12) you have used, purchased, sold, or installed that permanently or temporarily:

- (a) Alters the performance or operation, blocks, bypasses, defeats, disconnects, deletes, deactivates, removes (in part or in whole), or renders inoperative in any way any motor vehicle emission control component, element of design, and/or emission related part including, but not limited to the following systems: the DPF; EGR; SCR; catalyst; OBD; and any fluid, sensor, signal, control system, or records related to these systems;
- (b) Simulates, or can be programed to simulate, the operation of any motor vehicle or motor vehicle engine emission control component, element of design, and/or emission related part including, but not limited to the following systems: the DPF; EGR; SCR; catalyst; OBD; and any fluid, sensor, signal, control system, or record related to these systems; and/or
- (c) Modifies, or can be programed to modify, motor vehicle engine operating or emission control parameters or OBD functions including, but not limited to, those parameters sensed or controlled by the ECM.

8. In the same electronic, unlocked spreadsheet provided in response to Request 7, for each product identified in response to Request 7 that is a tune and/or tuner, identify whether the product is capable of the following:

- (a) Disabling or allowing the removal of the EGR without illuminating a MIL or prompting any OBD trouble code;
- (b) Altering the EGR, mass air flow, or charge air flow calibration maps;
- (c) Altering, disabling, or allowing the removal of the DPF without illuminating a MIL or prompting any DTC;
- (d) Altering, disabling, or allowing removal of the DOC without illuminating a MIL

or prompting any DTC;

- (e) Altering, disabling, or allowing removal of any component of the SCR system without illuminating a MIL or prompting any DTC;
- (f) Preventing the engine or vehicle from being derated or allows the vehicle to be restarted if disabled when the DEF tank is empty, poor quality DEF is present or any parts of the SCR system have been disabled;
- (g) Altering diesel fuel injection calibration maps to increasing fuel quantity, modify injection timing and injection pressure.

9. In an **electronic, unlocked Excel-compatible spreadsheet**, for each product identified in response to Request 7 that is not a tune or a tuner, identify:

- (a) All stock components each product replaces;
- (b) Whether the product requires tuning or a tuner;
- (c) Whether the product physically replaces, removes, or blocks off the EGR system;
- (d) Whether the product allows the EGR system to operate in its original motor vehicle engine manufacturer (OEM) stock configuration;
- (e) Whether the product allows the DPF system to operate in its OEM stock configuration;
- (f) Whether the product allows the DOC system to operate in its OEM stock configuration;
- (g) Whether the product allows the SCR system to operate in its OEM stock configuration;
- (h) Whether the product physically replaces or allows the removal of sensors connected to the ECM or OBD system; and
- (i) Whether the product allows the ECM or OBD system to operate in their OEM stock configuration.

10. In an **electronic, unlocked Excel-compatible spreadsheet**, for each product identified in response to Request 7 above, provide the following information:
- (a) Product number, the identifying product name, and the manufacturer's or supplier's part number or component part number and identifying name;
  - (b) Product manufacturer's name and address;
  - (c) Product applications by vehicle make(s), vehicle model(s), engine model(s), and engine year(s);
  - (d) Product description;
  - (e) Quantity of product that was manufactured, purchased, and/or imported by you by calendar year;
  - (f) Quantity of product that was sold or offered for sale by you, by calendar year;
  - (g) Quantity of product that was installed by you, by calendar year; and
  - (h) Indicate whether BH92, or any other entity, conducted any emissions testing regarding any effect the product may have on vehicle emissions (*see* Request 6 for a description of emissions testing), and provide the CARB EO number, if any.
11. For any tests identified in response to Request 10(h) above, if not already provided in response to Request 6, provide the following information:
- (a) A description of the test, including identification of the part or component and vehicle, EPA engine family, name of the vehicle, test equipment, test protocols, and calibration procedures;
  - (b) A copy of the test report which includes the date and location of the test, the name and position of the person that conducted the test, and the test results; and
  - (c) A copy of any California Air Resources Board Executive Order for the part or component.
12. For each product identified in response to Request 7 above, if not already provided in response to Request 5, provide the following documents from June 1, 2016 to the date of this request:
- (a) Copies of your advertisements to sell, distribute, and/or install the product, including advertisements on websites and in other media;
  - (b) Copies of any installation or operation instructions, guides, or manuals related to the product;

- (c) Copies of all receipts or invoices for all products purchased by you;
  - (d) Copies of all receipts or invoices for all of products sold by you; and
  - (e) Copies of all receipts or invoices for all of products installed by you.
13. Identify all persons consulted in responding to this Request for Information, including his/her title(s) and relationship to BH92 (*e.g.*, employee, contractor, *etc.*), the request(s) to which each individual responded, and the period of time for which each individual is providing a response.

## **Appendix C**

### **Confidential Business and Personal Privacy Information**

#### **Assertion Requirements**

You may assert a business confidentiality claim covering any parts of the information requested in the attached Appendix B, as provided in 40 C.F.R. § 2.203(b).

Emission data provided under Section 208 of the CAA, 42 U.S.C. § 7542, is not entitled to confidential treatment under 40 C.F.R. Part 2.

“Emission data” means, with reference to any source of emissions of any substance into the air:

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. § 2.301(a)(2)(i)(A), (B) and (C).

To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document for which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a caption or other suitable form of notice to indicate the intent to claim confidentiality. The stamped or typed caption or other suitable form of notice should employ language such as “trade secret” or “proprietary” or “company confidential” and indicate a date, if any, when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by EPA only to the extent permitted and by means of the procedures set forth at Section 208(c) of the CAA and 40 C.F.R. Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the information request as a waiver of that claim, and the information may be made available to the public without further notice to you.

## **Determining Whether the Information Is Entitled to Confidential Treatment**

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208, which provides in part that you must satisfactorily show: that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so, that the information is not and has not been reasonably obtainable by legitimate means without your consent and that disclosure of the information is likely to cause substantial harm to your business's competitive position.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking that you support your confidential business information (CBI) claim. If you receive such a letter, you must respond within the number of days specified by EPA. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential by page, paragraph and sentence. Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being CBI, EPA will ask that you answer the following questions, giving as much detail as possible:

1. For what period of time do you request that the information be maintained as confidential, *e.g.*, until a certain date, until the occurrence of a special event or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question number 1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, explain with specificity why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as

substantial and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
8. Is there any other information you deem relevant to EPA's determination regarding your claim of business confidentiality?

If you receive a request for a substantiation letter from the EPA, you bear the burden of substantiating your confidentiality claim. Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

### **Personal Privacy Information**

Please segregate any personnel, medical and similar files from your responses and include that information on a separate sheet(s) marked as "Personal Privacy Information." Disclosure of such information to the general public may constitute an invasion of privacy.



**CERTIFICATE OF MAILING**

I certify that I sent a Request to Provide Information Pursuant to the Clean Air Act by

Certified Mail, Return Receipt Requested, to:

Alen Poskovic  
BH92 Trucking.  
3529 Lousma Dr. SE  
Grand Rapids, Michigan 49548

I also certify that I sent a copy of the Request to Provide Information Pursuant to the

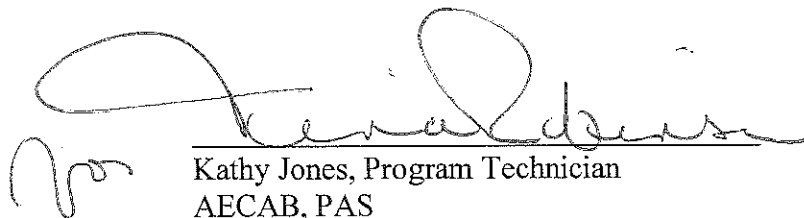
Clean Air Act by E-mail to:

Malcolm Mead-O'Brien  
Enforcement Unit Supervisor, Acting  
Air Quality Division  
Michigan Department of Environmental Quality  
[Meadm1@michigan.gov](mailto:Meadm1@michigan.gov)

And

Heidi Hollenbach  
District Supervisor  
Grand Rapids Air Quality Division  
Michigan Department of Environmental Quality  
[hollenbachh@michigan.gov](mailto:hollenbachh@michigan.gov)

On the 26<sup>th</sup> day of December 2018.

  
Kathy Jones, Program Technician  
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER:

797066000036618465

